

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re)	Chapter 9
)	
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	
Debtor.)	Hon. Steven W. Rhodes
)	

**ANSWERS TO DEBTOR'S FIRST SET OF INTERROGATORIES TO RETIRED
DETROIT POLICE MEMBER'S ASSOCIATION**

Pursuant to Federal Rules of Civil Procedure 26 and 33, made applicable to this proceeding by Federal Rules of Bankruptcy Procedure 7026, 7033, and 9014 and the Second Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment [Doc. No. 2755], the Retired Detroit Police Members Association ("RDPMA") submits its answers to the City's First Set of Interrogatories served on the RDPMA as follows:

PRELIMINARY STATEMENT

1. The RDPMA'S investigation and development of all facts and circumstances relating to this action is ongoing. These responses and objections are made without prejudice to, and are not a waiver of RDPMA'S right to rely on other facts or documents at trial.
2. By making the accompanying responses and objections to City's requests for documents and interrogatory, the RDPMA does not waive, and hereby expressly reserves, its right to assert any and all objections as to the admissibility of such responses into evidence in this action, or in any other proceedings, on any and all grounds including, but not limited to, competency, relevancy, materiality, and privilege. Further, the RDPMA makes the responses and objections herein without in any way implying that it considers the requests and interrogatory, and responses to the requests and interrogatory, to be relevant or material to the subject matter of this action.

3. The RDPMA expressly reserves the right to supplement, clarify, revise, or correct any or all of the responses and objections herein, and to assert additional objections or privileges, in one or more subsequent supplemental response(s).
4. Publicly available documents including, but not limited to, newspaper clippings, City of Detroit plans, court papers, and documents available on the Internet, will not be produced.

ANSWERS TO INTERROGATORIES

1. Identify any custodians of documents requested in the accompanying Requests for Production of Documents (served herewith).

RESPONSE: The sole responsive document produced by the RDPMA is the Retired Detroit Police Members Association's Presentation to the Detroit Legislative Delegation, March 28, 2014 (the "Presentation"). The custodian of the Presentation is Brenda Goss Andrews, the president of the RDPMA.

2. Identify and describe any research, studies, or analysis conducted by, requested, reviewed, or received by you or on your behalf regarding the Plan, or any alternative to the Plan, that address issues such as, but not limited to, the City of Detroit's current financial health, projected financial health, taxes (wagering, property, income), the Detroit Institute of Arts ("DIA"), Detroit Water and Sewer Department ("DWSD"), Detroit's Public Lighting Authority ("PLA"), or the Restructuring and Reinvestment Initiatives outlined in the Plan.

RESPONSE: The RDPMA objects to this Interrogatory on the grounds that it is vague, ambiguous, and overly broad. Subject to and without waiver of the foregoing objections the RDPMA, as an association, has not conducted, requested, reviewed or received any research, studies or analysis regarding the Plan other than the research, studies and/or analyses that are generally available to the public and are in the public domain.

3. Please indicate whether you have analyzed, or have any intention to challenge other creditors' claims and/or their recoveries if the Plan is confirmed.

RESPONSE: The RDPMA objects to this interrogatory as an improper and premature contention interrogatory and pursuant to Fed. R. Civ. P. 33(c), the RDPMA object to this interrogatory on the grounds that it is premature in light of the present early stage of discovery. Subject to and without waiving any of its objections, the RDPMA is not currently aware of any creditors' claims and/or recoveries that it intends to challenge. The RDPMA reserves the right to amend and/or alter the response to this interrogatory.

4. Please identify a lead person or persons who have knowledge of your financial condition under different recovery levels and your financial condition in the event the Plan is not approved or is dismissed.

RESPONSE: The RDPMA objects to this interrogatory on the grounds that it is vague, ambiguous and irrelevant. Subject to and without waiving any of its objections, the RDPMA states that it is not a party that shall receive a recovery in the event the Plan is or is not approved.

5. Please indicate whether you have purchased or sold any claims against the City of Detroit and, if so, the price at which you purchased or sold those claims and the date(s) on which you purchased or sold those claims.

RESPONSE: The RDPMA has not purchased or sold any claims against the City of Detroit.

6. Please indicate whether you have had any communications with any foreign or domestic governmental regulators related to the City of Detroit bankruptcy, the Plan, or your City of Detroit debt holdings. If so, please also identify the person or persons most knowledge about these communications.

RESPONSE: The RDPMA has not had any any communications with any foreign or domestic governmental regulators related to the City of Detroit bankruptcy, the Plan, or any City of Detroit debt holdings.

7. Please identify and describe any communications you have had (or that have occurred on your behalf) with any government entities (listed below) or officials, directors, agents, representatives, or employees thereof regarding the City of Detroit. This interrogatory includes, but is not limited to, any efforts to enact legislation concerning, or any effort to obtain funds for, the City of Detroit. This interrogatory covers the following governmental entities: The White House, any United States executive branch agencies or departments; the United States Congress; the Executive Office of the Governor of the State of Michigan; the State of Michigan Legislature; the City Council of the City of Detroit; and the Office of the Mayor of the City of Detroit.

RESPONSE: The RDPMA objects to this Interrogatory on the grounds that it is vague, ambiguous, and overly broad. The RDPMA further objects to this Interrogatory on the grounds that it is has the effect of invading, intruding into, and chilling the First Amendment associational and privacy interests of the RDPMA and its constituents.

Subject to and without waiver of the foregoing objections the RDPMA has met with Michigan State Senators Coleman Young Jr. and Thomas Stallworth as well as meeting with the Executive Office of the Governor on March 28, 2014.

8. Please indicate whether you or some person or entity on your behalf has communicated with the U.S. Trustee regarding the Plan.

RESPONSE: The RDPMA objects to this interrogatory on the grounds that it is vague, ambiguous and overly broad. Subject to and without waiving any of its objections, the RDPMA states that it is not aware of any communication with any member of the US Trustee's office that has been made on behalf of the RDPMA regarding the Plan.

9. Please identify a lead person or persons who have knowledge of any research, studies, or analysis conducted by, requested, or received by you or on your behalf regarding the City of Detroit's future creditworthiness with or without Plan approval.

RESPONSE: The RDPMA objects to this interrogatory on the grounds that it is vague and ambiguous. Subject to and without waiving any of its objections, the RDPMA states that there has been no research, studies, or analysis conducted by, requested or received by the RDPMA regarding the City's future creditworthiness with or without Plan approval other than research, studies or analysis that is generally available to the public.

10. Please indicate whether you have any common interest or joint defense agreements with any other City of Detroit creditors.

RESPONSE: The RDPMA objects to this interrogatory as vague and ambiguous. Subject to and without waiving its objections, the RDPMA states that it has not entered into any formal common interest or joint defense agreement with any other City of Detroit Creditors.

11. Please identify any person or persons who have knowledge of debt limits or post-2006 assessments related to Limited Tax General Obligations.

RESPONSE: The RDPMA objects to this interrogatory on the grounds that it is vague and ambiguous. Subject to and without waiving any of its objections, the RDPMA states that it is not at this time aware of the identity of any individuals with the specific knowledge of the debt limits or post-2006 assessments related to Limited Tax General Obligations.

12. Please identify and describe any notifications you have sent to any insurance carriers, including but not limited to potential/actual malpractice or breach of fiduciary duty claims since January 1, 2004.

RESPONSE: The RDPMA objects to this interrogatory on the grounds that it is vague and ambiguous. Subject to and without waiving any of its objections, the RDPMA states that it has not of the date of executing this set of responses forwarded any notifications to any insurance carriers regarding any claims.

13. Please identify a lead person or persons who have knowledge of any communications undertaken by you or on your behalf with any unions, union members, retiree associations, retiree association members, or retirees related to the City of Detroit bankruptcy or the Plan.

RESPONSE: The RDPMA objects to this interrogatory on the grounds that it is vague and ambiguous and seeks privileged information. Subject to and without waiving any of its objections, the RDPMA states that Brenda Goss Andrews, the president of the RDPMA, Gail Wilson Turner, the vice president of the RDPMA, generally have knowledge of the communications undertaken by or on behalf of the RDPMA with the unions, union members, retiree associations, retiree association members or retirees relative to the City's bankruptcy and/or the Plan.

14. Please identify a lead person or persons who have knowledge of documents created before January 1, 2013, referring to any property included in the Detroit Institute of Arts, or the value of any such property in any evaluation of the City of Detroit, the creditworthiness of the City of Detroit, or the ability of the City of Detroit to pay its debts.

RESPONSE: The RDPMA objects to this interrogatory on the grounds that it is vague and ambiguous and seeks privileged information. Subject to and without waiving any of its objections, the RDPMA states it not able at this time to identify a lead person who may have knowledge regarding any documents created prior to January 1, 2013 referring to any

property included in the DIA or the value of such property, the creditworthiness of the City or its ability to pay its debts.

15. Please identify what individual(s) or entity(ies) is/are paying your attorneys' fees and expenses associated with the City of Detroit's bankruptcy.

RESPONSE: The RDPMA objects to this interrogatory on the grounds of relevance and to the extent it seeks privileged information. Subject to and without waiving any of its objections, the RDPMA states the RDPMA is paying its attorneys' fees and other expenses associated with the City's bankruptcy.

16. Please identify all documents that you intend to use as exhibits, including demonstrative exhibits.

RESPONSE: The RPMA has not yet determined the documents it may use as exhibits during a trial on confirmation as discovery is ongoing. The RDPMA reserves the right to amend its response to this interrogatory.

17. Please identify all fact witnesses who you will call.

RESPONSE: The RPMA has not yet determined the witnesses it will call during a trial on confirmation as discovery is ongoing. The RDPMA reserves the right to amend its response to this interrogatory.

18. Please identify all fact witnesses who you may call.

RESPONSE: The RPMA has not yet determined the witnesses it may call during a trial on confirmation as discovery is ongoing. The RDPMA reserves the right to amend its response to this interrogatory.

19. Please identify all experts whom you intend to call to testify and identify their area of expertise.

RESPONSE: The RDPMA has not retained any experts to call as a witness during the trial on confirmation.

I HAVE READ THE FOREGOING RESPONSES TO INTERROGATORIES AND THE RESPONSES PROVIDED THEREIN ARE TRUE TO THE BEST OF MY INFORMATION, KNOWLEDGE AND BELIEF.

RETIRED DETROIT POLICE MEMBERS ASSOCIATION

By: /s/ Brenda Goss Andrews
BRENDA GOSS ANDREWS
Dated: May 9, 2014 Its: President

Respectfully Submitted,

STROBL & SHARP, P.C.

<p align="center">ECF Certificate of Service</p> <p>I hereby certify that on May 9, 2014, I did electronically file the foregoing document with the Clerk of the Court using the ECF System which will send notification of such filing to all attorneys of record, and I hereby certify that I have mailed the foregoing document to the non-ECF participants via United States Mail.</p> <p><u>/s/ Karel J. Van Akin</u></p> <p>Karel J. Van Akin</p>
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/s/ Lynn M. Brimer
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